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Attorneys for Defendant and Cross-Complainant
HANLEES FREMONT, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

WEERACHAI CHAIWONG, an individual,

Plaintiff,

vs.

HANLEES FREMONT, INC., a California
Corporation, dba HANLEES FREMONT
HYUNDAI; ALLY FINANCIAL, INC., a
Delaware Corporation; and DOES 1 through
75, inclusive,

Defendants.

Case No. 4:16-cv-04074-HSG

**STIPULATED REQUEST FOR ORDER
EXTENDING TIME FOR HANLEES
FREMONT, INC. TO RESPOND TO
ALLY FINANCIAL'S MOTION TO
DISMISS AMENDED CROSS-CLAIM,
AND FOR ALLY TO FILE ITS REPLY,
PURSUANT TO LOCAL RULE 6-2**

Action Filed: May 25, 2016
Alameda Superior

Removed to USDC, ND of California:
July 20, 2016

Pursuant to Local Rule 6-2, defendant and cross-complainant Hanlees Fremont, Inc.
("Hanlees"), defendant Ally Financial Inc. ("Ally"), and Plaintiff Weerachai Chaiwong (together,
the "Parties"), by and through their respective counsel of record, hereby stipulate as follows:

STIPULATION

WHEREAS, Hanlees filed an answer to plaintiff's second amended complaint and a first
amended cross-claim against Ally on October 27, 2017;

WHEREAS, Hanlees stipulated to a 17-day extension of time for Ally to respond to the
amended cross-claim, from November 10, 2017 to November 27, 2017;

WHEREAS, Ally filed a motion to dismiss the amended cross-claim on November 27,
2017;

1 WHEREAS, Hanlees' opposition to Ally's Motion to Dismiss is presently due to be filed
2 on December 11, 2017;

3 WHEREAS, counsel for Hanlees is engaged in a hearing on the merits of another case now
4 before the American Arbitration Association, *Gless v. Zoom*, that has been extended to December
5 11, 2017;

6 WHEREAS, the parties have stipulated to an extension of time for Hanlees to file such
7 opposition up to and including December 22, 2017;

8 WHEREAS, the extension on the deadline for Hanlees to file its opposition would make
9 Ally's reply due on December 29, 2017;

10 WHEREAS, Ally's counsel has scheduling conflicts the week of December 25, 2017, and
11 the parties have stipulated that Ally may have an extension of time to file its reply to and including
12 January 4, 2018; and

13 WHEREAS, these extensions will not have any effect on the current schedule for the case.

14 IT IS HEREBY STIPULATED, by and between the Parties hereto, through their
15 respective attorneys of record, to an order granting Hanlees an 11-day extension, up to and
16 including December 22, 2017, in which to file a response to Ally's Motion to Dismiss the
17 amended cross-claim. IT IS FURTHER STIPULATED that Ally may have an extension on its
18 deadline to file its reply to January 4, 2018.

19 This Stipulation requests the first extension of time for Hanlees to respond to Ally's
20 motion to dismiss the amended cross-claim and for Ally to file its reply in support of the motion to
21 dismiss, and is made without prejudice to, or waiver of, any rights or defenses otherwise available
22 to the Parties in this action.

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1 DATED: December 11, 2017

SEVERSON & WERSON
A Professional Corporation

2
3 By: /s/ Erik Kemp
4 Erik Kemp

5 Attorneys for Defendant
6 ALLY FINANCIAL INC.

7 DATED: December 11, 2017

LAW OFFICES OF MARTIN PUTNAM

8
9 By: /s/ Martin Putnam
10 Martin Putnam

11 Attorney for Defendant and Cross-Complainant
12 HANLEES FREMONT, INC.

13 DATED: December 11, 2017

LAW OFFICES OF GLASSEY | SMITH

14
15 By: /s/ Joshua C. Anaya
16 Joshua C. Anaya

17 Attorneys for Plaintiff
18 WEERACHAI CHAIWONG

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20 DATED: 12/13/2017

21 
UNITED STATES DISTRICT JUDGE